

## COUNTY OF NASSAU OFFICE OF THE COUNTY ATTORNEY

May 2, 2022

## Via ECF and First-Class Mail

Hon. Joan M. Azrack United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re: Rodriguez v. The County of Nassau, et al.

CV-18-3845 (JMA) (JMW)

## Dear Judge Azrack:

The Office of the Nassau County Attorney represents defendants County of Nassau, Police Commissioner for Nassau County 5<sup>th</sup> Precinct, Detective Kelly, Sergeant Gubba, and Police Officers Nordquist, Leeb, McGowan, Battista, and Grogan, in the above-referenced action.

Defendants motion for summary judgment pursuant to Federal Rules of Civil Procedure 56 is now fully briefed. In accordance with Section IV.G.2 of this Court's Individual Rules below is a list of all documents constituting that motion. A courtesy copy of these documents is being submitted today.

| Document Name/Description                                | Docket Entry ("DE") |
|--|---------------------|
| Notice of Motion   | 50                  |
| Rule 56.1 Statement of Undisputed Material Facts         | 50-1                |
| Rule 56.2 Notice to Pro Se Litigant                      | 50-2                |
| Declaration  | 51                  |
| Exhibit A – Summons and Complaint                        | 51-1                |
| Exhibit B - Answer                                       | 51-2                |
| Exhibit C – Victim's Supporting Depositions              | 51-3                |
| Exhibit D – Signed Consents to Search                    | 51-4                |
| Exhibit E – Hon. Quinn Decision after Hearings           | 51-5                |
| Exhibit F – Court Order re: Grand Jury Proceedings       | 51-6                |
| Exhibit G – Copy of Indictment                           | 51-7                |
| Exhibit H – Copy of Signed Miranda Card                  | 51-8                |
| Exhibit I – Plaintiff's Confession                       | 51-9                |
| Exhibit J – Color Copy of Plaintiff's MugShot            | 51-10               |
| Exhibit K – Color Copy of Plaintiff's NCCC ID Card Photo | 51-11               |

| Exhibit L – Signed Physical Condition Questionnaires (2)     | 51-12 |
|--|-------|
| Exhibit M – NCCC Medical Intake Evaluation                   | 51-13 |
| Exhibit N – Sentencing Form                                  | 51-14 |
| Defendants' Memorandum of Law in Support of Summary          | 52    |
| Judgment   |       |
| Certificate of Service for Defendants' Initial Motion Papers | 52-1  |
| Plaintiff's Opposition to Summary Judgment                   | 53    |
| Reply Memorandum of Law                                      | 54    |
| Defendants' Response to Plaintiff's Statement of Facts       | 54-1  |
| Certificate of Service for Defendants' Reply                 | 54-2  |

Thank you for your time and attention to this matter.

Respectfully submitted,

Liora M. Ben-Sorek Liora M. Ben-Sorek Deputy County Attorney

## Enclosures

cc: Marbin Rodriguez (without enclosures)

Plaintiff *Pro Se* 

(Via First Class Mail)